

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2020-106-A**

IN RE:	)	
	)	
Actions in Response to COVID-19	)	<b>NOTICE OF APPEARANCE</b>
	)	
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YOU WILL PLEASE TAKE NOTICE that **Charles L.A. Terreni** gives notice of appearance of counsel on behalf of **Frontier Communications of the Carolinas, LLC**, in the above-captioned matter.



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Columbia, South Carolina  
May 22, 2020



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May 22, 2020

The Honorable Jocelyn G. Boyd  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

**Re: Docket 2020-106-A. Petition dated May 8, 2020 of the Office of Regulatory Staff  
for Comments**

Dear Ms. Boyd:

In accordance with the Commission's Directive Order No. 2020-32, I am writing on behalf of Frontier Communications of the Carolinas LLC ("Frontier") to respond to the petition of the Office of Regulatory Staff filed on May 8, 2020.

Frontier has extended its commitments under the Federal Communications Commission's Keep Americans Connected Pledge through June 30, 2020. The Pledge includes Frontier's commitment to:

- (1) not terminate service to any residential or small business customers because of their inability to pay their bills due to the disruptions caused by the coronavirus pandemic; and
- (2) waive any late fees that any residential or small business customers incur because of their economic circumstances related to the coronavirus pandemic.

Under this Pledge, Frontier works with customers experiencing a financial hardship due to the coronavirus pandemic to establish an individualized payment plan based on the customer's situation and needs. While a customer's payment plan is in effect, Frontier does not report outstanding account balances to credit reporting agencies or undertake other collection activity.

Frontier also works with customers to determine whether there are alternate, lower cost service options available for that customer. For example, Frontier supports the Lifeline program

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and provides customers with information on the program benefits, eligibility requirements and how to apply.

Frontier believes that its participation in the Keep Americans Connect Pledge and its standard business processes, as well as the additional deferred payment plan flexibility made possible by this Commission's Order No. 2020-344, provide reasonable and appropriate measures to mitigate the negative impacts of the pandemic on Frontier and its customers. The other measures suggested for consideration in ORS's petition, including the waiver of credit card processing fees and returned check charges, would not allow Frontier a reasonable opportunity to recover the third-party charges it incurs. As such, these measures should not be required.

In addition, Frontier, like many telephone carriers, does not operate on a rate of return basis. Accordingly, there is not a regulatory mechanism for it to recover the costs associated with providing consumers additional flexibility in the future. For this reason, Frontier requests the Commission exempt it from reporting on COVID19 related costs and savings, as recommended by ORS.

We appreciate the opportunity to provide these comments to the Commission.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan A. Miller".

Susan Miller

cc: Nanette S. Edwards, Esq.  
Carri Grube Lybarker, Esq.  
Counsel of Record

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2020-106-A**  
**CERTIFICATE OF SERVICE**

I, **CARL E. BELL**, hereby certify that I have, on this **22nd day of May 2020**, served the **Notice of Appearance and Comments of Frontier Communications of the Carolinas, LLC**, by Efiling with the **South Carolina Public Services Commission** and the parties by email to the addresses listed below:

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